Appendix H

Audit Sample Results from OEPA

SSCAP
Stationary Source Compliance Audit Program

Sample Measurement Results

These are the results for **Audit Sample Number M29-4441-01a**. Use the menu buttons on the left to perform other actions.

Concentration Results

Compound	Measured Concentration	Actual Concentration	Pass/Fail
arsenic(As)	18.80 µg/ml	21.60 µg/ml	PASS
beryllium(Be)	7.74 µg/ml	8.00 µg/ml	PASS
cadmium(Cd)	14.90 µg/ml	16.80 µg/ml	PASS
chromium(Cr)	19.40 µg/ml	21.60 µg/ml	PASS
lead(Pb)	60.70 µg/ml	68.00 µg/ml	PASS
manganese(Mn)	18.40 µg/ml	20.00 µg/ml	PASS

Audit Sampling Dates

Audit Starting Date:	**05/11/2010**
Audit Ending Date:	**05/12/2010**

Collection Firm

Collection Firm Name:	**AECOM, Inc.**
Street Address:	**2 Technology Park Drive**
City:	**Westford**
State:	**MA**
ZIP:	**01886**
Office Telephone No.:	**978-589-3200**

Analyzing Laboratory

Laboratory Name:	**TestAmerica**
Street Address:	**880 Riverside Parkway**
City:	**West Sacramento**
State:	**CA**

ZIP:	**95605**
Telephone No.:	**916-374-4333**

Audit Test Site Information

Audit Site Name:	**Heritage-WTI**
Street Address:	**1250 St. George St.**
City:	**East Liverpool**
State:	**OH**
ZIP:	**43920**

Method 29 Audit Material
(Multi-Metals Spiked Solution)

REPORTING FORM: To be completed by laboratory

Request Number/Sample Number: M29-4441-01a/AM-1806 Date Issued: 03/29/10

Auditee:

Company: TestAmerica

Address: 880 Riverside Parkway, West Sacramento CA, 95605

Attention of: Robert Lakefield Phone: (916) 374-4323

Requestor:

Agency: Ohio EPA

Address: 2110 East Aurora Road, Twinsburg, OH 44087

Attention of: Pam Korenewych Phone: 330-963-1237

Project Name: undisclosed

Audit Results (Results in µg/mL)

Analyte	Result
Arsenic	18.8
Beryllium	7.74
Cadmium	14.9
Chromium	19.4
Lead	60.1
Manganese	18.4

Procedure:

20mL of audit sample was spike into 100mL 0.1N HNO_3

spike by ECL 5/21/10 witness by JP 5/21/10

Stationary Source Compliance Audit Program

Request Audit Samples

Report Results

Edit Address

Edit Request Information

Create Reports

End Session

SSCAP
Stationary Source Compliance Audit Program

Sample Measurement Results

These are the results for **Audit Sample Number M29-4441-01b.** Use the menu buttons on the left to perform other actions.

Concentration Results

Compound	Measured Concentration	Actual Concentration	Pass/Fail
mercury(Hg)	54.50 µg	58.25 µg	PASS

Audit Sampling Dates

Audit Starting Date:	**05/11/2010**
Audit Ending Date:	**05/12/2010**

Collection Firm

Collection Firm Name:	**AECOM, Inc.**
Street Address:	**2 Technology Park Drive**
City:	**Westford**
State:	**MA**
ZIP:	**01886**
Office Telephone No.:	**978-589-3200**

Analyzing Laboratory

Laboratory Name:	**TestAmerica**
Street Address:	**880 Riverside Parkway**
City:	**West Sacramento**
State:	**CA**
ZIP:	**95605**
Telephone No.:	**916-374-4333**

Audit Test Site Information

Audit Site Name:	**Heritage-WTI**

Street Address:	**1250 St. George St.**
City:	**East Liverpool**
State:	**OH**
ZIP:	**43920**

GOE140473-5

Method 29 Compliance Audit Material
(Mercury Acidified Aqueous Solution)

REPORTING FORM: To be completed by laboratory

Request Number/Sample Number: M29-4441-01b/HG-4041 Date Issued: 03/29/10

Auditee:

Company: TestAmerica

Address: 880 Riverside Parkway, West Sacramento CA 95605

Attention of: Robert Westerfield Phone: (916) 374-4377

Requestor:

Agency: Ohio EPA

Address: 2110 East Aurora Road, Twinsburg, OH 44087

Attention of: Pam Korenewych Phone: 330-963-1237

Project Name: undisclosed

Audit Results (Results in µg)

Compound	Result
Mercury	54.5

SSCAP
Stationary Source Compliance Audit Program

Sample Measurement Results

These are the results for **Audit Sample Number M26A-4445-01**. Use the menu buttons on the left to perform other actions.

Concentration Results

Compound	Measured Concentration	Actual Concentration	Pass/Fail
hydrogen chloride	136.00 mg/L	136.00 mg/L	PASS

Audit Sampling Dates

Audit Starting Date:	**05/11/2010**
Audit Ending Date:	**05/12/2010**

Collection Firm

Collection Firm Name:	**AECOM, Inc.**
Street Address:	**2 Technology Park Drive**
City:	**Westford**
State:	**MA**
ZIP:	**01886**
Office Telephone No.:	**978-589-3200**

Analyzing Laboratory

Laboratory Name:	**TestAmerica**
Street Address:	**880 Riverside Parkway**
City:	**West Sacramento**
State:	**CA**
ZIP:	**95605**
Telephone No.:	**916-374-4333**

Audit Test Site Information

Audit Site Name:	**Heritage-WTI**

Street Address:	**1250 St. George St.**
City:	**East Liverpool**
State:	**OH**
ZIP:	**43920**

Method 26A Audit Material
(Cl- Spiked Aqueous Solution)

REPORTING FORM: To be completed by laboratory

Request Number/Sample Number: M26A-4445-01/L3730 Date Issued: 03/31/10

Auditee:

Company: Test America

Address: 880 Riverside Parkway, West Sacramento CA 95605

Attention of: Robert Weichtell Phone: (916) 374-4333

Requestor:

Agency: Ohio EPA - Northeast District

Address: 2110 East Aurora Road, Twinsburg, OH 44087

Attention of: Pam Korenewych Phone: 330-963-1200

Project Name: Undisclosed

Audit Results (Results in mg/L)

Analyte	Result
Chloride concentration	136. mg/L

JOR
5.27.10

Revised 10/03

www.erg.com

March 29, 2010

Requestor: Pam Korenewych
Ohio EPA – Northeast District
2110 East Aurora Road
Twinsburg, OH 44087
(330) 963-1237

Dear Pam Korenewych:

Eastern Research Group (ERG) have been directed by the U.S. EPA to provide the following audit materials for a **Method 29 Metals audit; Numbers M29-4441-01a and -01b.** These audit samples are for an upcoming audit at **an undisclosed location** and are being sent directly to **you** per your **automated database** request.

Please note: requests for Method 29 mercury have **NEW Instructions associated with these samples,** effective October 2004.

Method 29
request M29-4441-01a:
- one each spiked **Method 29 aqueous metals** sample; **Sample No. AM - 1806**

request M29-4441-01b:
- one each spiked **Method 29 aqueous mercury** sample; **Sample No. HG - 4041**

Please note that each sample is individually labeled and shipped with an instruction sheet and an example REPORTING FORM for reporting the laboratory audit results. All results are to be reported to the automated computerized database.

You are urged to instruct the laboratory to analyze the audit samples along with the designated field samples. The audit sample should be analyzed as a routine field sample according to the specifications of the Test Method and using the supplied instructions. The audit results are to be reported to you, the requestor, by the analyst, using the example Reporting Form, in the units specified in the instructions. You then will use the automated database to enter the results into the SSAP database.

We would like to thank you for your participation in the Stationary Source Audit Program. If you have any questions concerning the audit or the database, please contact either Thomas Mckenzie (919) 468-7920 or myself at 468-7887. My fax number is (919) 468-7803.

Sincerely,

Ray Merrill

CC: sent with audit samples

Method 29 Audit Material
(Multi-Metals Spiked Solution)

REPORTING FORM: To be completed by laboratory

Request Number/Sample Number: M29-4441-01a/AM-1806 Date Issued: 03/29/10

Auditee:

Company: _____

Address: _____

Attention of: _____ Phone: _____

Requestor:

Agency: Ohio EPA

Address: 2110 East Aurora Road, Twinsburg, OH 44087

Attention of: Pam Korenewych Phone: 330-963-1237

Project Name: undisclosed

Audit Results (Results in µg/mL)

Analyte	Result
Antimony	
Beryllium	
Cadmium	
Chromium	
Lead	
Manganese	

INSTRUCTIONS FOR PREPARATION AND ANALYSIS OF METHOD 29 MULTI-METALS AUDIT SOLUTION

The ampule you received contains approximately 23 mL of an aqueous solution that is 2 % nitric acid by volume and has been spiked with various metals. To prepare and analyze each multi-metal audit sample solution, follow the steps below.

1) Wrap a paper towel around the ampule, and with the ampule in an upright position, break off the top at the pre-scored mark by exerting pressure sideways.

2) From the ampule, pipette exactly 20 mL of the audit sample into a 250-mL beaker. Add 100 mL of 0.1N HNO_3 to the beaker and label the sample "Sample Fraction 2A". Evaporate the sample to 20 mL on a steam bath as directed in Section 8.3.4 of Method 29.

3) Digest the entire Sample Fraction 2A as directed in either Section 8.3.4.1 or 8.3.4.2 of Method 29. After digesting the sample, filter the sample using Whatman 541 filter paper, and dilute the filtrate to **150 mL**. Label the diluted sample as Analytical Fraction 2A.
(**Note:** If there is a filter audit sample, it will become Analytical Fraction 1A.)

4) Analyze Analytical Fraction 2A as described in Section 11.1.1 or 11.1.2 of Method 29 for the target metals listed on the attached Method 29 Audit Solution **Reporting Form**.

5) Record the concentration results on the Method 29 multi-metals audit solution **Reporting Form** in units of µg/mL for each target metal listed for Analytical Fraction 2A.

6) Report the Method 29 metals audit solution results recorded on the **Reporting Form** to the designated agent.

Method 29 Compliance Audit Material
(Mercury Acidified Aqueous Solution)

REPORTING FORM: To be completed by laboratory

Request Number/Sample Number: M29-4441-01b/HG-4041 Date Issued: 03/29/10

Auditee:

Company: _____

Address: _____

Attention of: _____ Phone: _____

Requestor:

Agency: Ohio EPA

Address: 2110 East Aurora Road, Twinsburg, OH 44087

Attention of: Pam Korenewych Phone: 330-963-1237

Project Name: undisclosed

Audit Results (Results in µg)

Compound	Result
Mercury	

INSTRUCTIONS FOR PREPARATION AND ANALYSIS OF METHOD 29 MERCURY (Hg) AUDIT SAMPLE

The ampule you have received contains approximately 20 mL of an aqueous solution that is 10% nitric acid by volume and has been spiked with mercury. Method 29 can consist of five analytical Hg fractions (1B, 2B, 3A, 3B, and 3C). The enclosed Hg audit sample corresponds to Hg Analytical Fraction 2B, which is produced from the Container No. 4 field fraction listed in Method 29, Section 8.3.4. To prepare each mercury audit sample solution for analysis, follow the steps below.

1) Wrap a paper towel around the ampule and with the ampule in an upright position, break off the top at the pre-scored mark by exerting pressure sideways.

2) From the ampule, pipette exactly 10 mL of the audit sample solution into a 200 mL volumetric flask. Add DI water to the flask to make a total volume of 200 mL. This sample is equivalent to "Container 4" of
Method 29, which contains Sample Fraction 2.

3) Pipette 100 mL of Sample Fraction 2 into a 300 mL BOD bottle and label the sample "Analytical Fraction 2B".

4) To digest the sample in the BOD bottle, sequentially add the sample digestion solutions and perform the sample preparation described in Section 7.1 of Method 7470A:

> Add 5 mL of H_2SO_4 and 2.5 mL of concentrated HNO_3, mixing after each addition. Add
> 15 mL of potassium permanganate solution to the sample bottle. Shake and add additional portions of potassium permanganate solution, if necessary, until the purple color persists for at least 15 min. Add 8 mL of potassium persulfate to the bottle and heat for 2 hr in a water bath maintained at 95°C. Cool and add 6 mL of sodium chloride-hydroxylamine sulfate to reduce the excess permanganate. After a delay of at least 30 sec, add 5 mL of stannous sulfate, and immediately attach the bottle to the aeration apparatus and continue as described in Section 7.3 of Method 7470A.

5) Analyze Analytical Fraction 2B as described in Section 7.3 of Method 7470A.

6) Calculate the mass of Hg in Sample Fraction 2 using the following equation.

$$Hg_{SF2} = \frac{Q_{AF2B}}{V_{AF2B}} \left(V_{SF2} \right)$$

where:

Hg_{SF2}	=	Total mass of Hg in Sample Fraction 2 (Container 4), µg
Q_{AF2B}	=	Total mass of Hg in 100 mL of Analytical Fraction 2B, µg
V_{AF2B}	=	Volume of Analytical Fraction 2B analyzed, (100 mL)
V_{SF2}	=	Total volume of Sample Fraction 2, (200 mL)

7) Record the **total mass of Hg in units of µg** on the Method 29 Reporting Form.

8) Report the Method 29 Hg audit sample results to the designated agent.

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RECEIVED
APR - 1 2010
OHIO EPA NEDO

March 31, 2010

Requestor: Pam Korenewych
Ohio EPA - Northeast District
2110 East Aurora Road
Twinsburg, OH 44087

Dear Pam Korenewych:

Eastern Research Group (ERG) has been directed by the U.S. EPA to provide you with **one** ampoule of the following audit materials for a **Method 26A HCl audit; Number M26A-4445-01.** This audit sample is for an upcoming audit at **an undisclosed location** and is being sent directly to **you** per your **automated database** request.

Please note: requests for Method 26A are now filled separately from requests for Method 26 and that there are **NEW Instructions associated with these samples,** effective October 2003.

Method 26A

request M26A-4445-01:

- one **Method 26A HCl sample**; Sample No. **L - 3730**

Please note that each sample is individually labeled and shipped with an instruction sheet with the format for reporting the laboratory audit results. All results are to be reported to the internet **automated computerized database.**

You are urged to instruct the laboratory to analyze the audit samples along with the designated field samples. The audit sample should be analyzed as a routine field sample according to the specifications of the Test Method and using the supplied instructions. The audit results are to be reported to you, the requestor, by the analyst, using the Reporting Form, in the units specified in the instructions. You then will use the **automated database** to enter the results into the SSAP database.

We would like to thank you for your participation in the Stationary Source Audit Program. If you have any questions concerning the audit or the database, please contact either Thomas Mckenzie (919) 468-7920 or myself at 468-7887. My fax number is (919) 468-7803.

Sincerely,

Ray Merrill

601 Keystone Park Drive, Suite 700, Morrisville, NC 27560, Telephone: (919) 468-7800, Fax (919) 468-7803
Arlington, VA · Atlanta, GA · Austin, TX · Boston, MA · Chantilly, VA · Chicago, IL · Fairfield, CT
Harrisburg, PA · Kansas City, KS · Lexington, MA · Nashua, NH · Research Triangle Park, Morrisville, NC · Sacramento, CA
Equal Opportunity Employer

Method 26A Audit Material
(Cl- Spiked Aqueous Solution)

REPORTING FORM: To be completed by laboratory

Request Number/Sample Number: M26A-4445-01/L3730 Date Issued: 03/31/10

Auditee:

Company: _____

Address: _____

Attention of: _____ Phone: _____

Requestor:

Agency: Ohio EPA - Northeast District

Address: 2110 East Aurora Road, Twinsburg, OH 44087

Attention of: Pam Korenewych Phone: 330-963-1200

Project Name: Undisclosed

Audit Results (Results in mg/L)

Analyte	Result
Chloride concentration	

INSTRUCTIONS FOR THE PREPARATION AND ANALYSIS OF METHOD 26A AUDIT SOLUTION

Note: This audit sample corresponds to the Method 26A Container No. 3 aqueous sample referred to as the acid sample or hydrogen halides fraction. There is no filter included with the audit solution, and there is no audit solution for the Container No. 4 alkaline sample or halogens sample fraction.

The ampule you received contains approximately 20 mL of an aqueous mixture of water that is spiked with a low concentration of chloride.

1) Wrap a paper towel around the ampule, and with the ampule in the upright position, break off the top at the pre-scored mark by carefully exerting pressure sideways.

2) Pipette exactly 10 mL of the audit sample from the ampule into a 500 mL volumetric flask. Dilute exactly to the 500 mL mark with DI water and mix well. (This is called the Diluted Sample.)

3) Analyze the Diluted Sample in accordance with the procedures in Section 11.1 of Method 26A. (Note: The Diluted Sample may require further dilution with DI water to bring it within the calibration range of the analytical instrument. This decision is left to the analyst.)

4) Calculate the concentration of chloride in the Diluted Sample in mg/L.

5) Record the chloride concentration in the Diluted Sample on the enclosed **Reporting Form** in units of mg/L.

6) Report the Method 26A chloride concentration, in the Diluted Sample on the **Reporting Form**, to the designated agent.

HERITAGE-WTI

HERITAGE-WTI, INC.
1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

OHSAS 18001: 2007
ISO 14001: 2004
ISO 9001: 2008

RECEIVED
JUL 03 2012
AIR ENFORCEMENT BRANCH
U.S. EPA REGION 5

Mr. Erik Bewley
Ohio EPA - NEDO
Division of Air Pollution Control
2110 East Aurora Rd
Twinsburg, OH 44087

June 29, 2012
VIA CERTIFIED MAIL

RE: Heritage-WTI, Inc.
Facility ID: 02-15-02-0233
MACT Confirmatory Test Plan
Revision 1

Dear Mr. Bewley:

On June 26, 2012, a conference call took place between members of the Heritage-WTI, Inc. (WTI) staff and Mr. Charles Hall of US EPA. During the call, Mr. Hall identified items that were found to have been omitted from WTI's MACT Confirmatory Test (CfPT) Plan. This CfPT plan had been submitted as Revision 0 to Ohio EPA and US EPA on May 12, 2012.

The initial item discussed was a failure of the plan to include a detailed test protocol as specified in 40 C.F.R. 63.1207 (f)(2)(vii). WTI acknowledges this error and has revised the CfPT Plan to include this required element. Accompanying this letter is a document titled MACT Confirmatory Test Plan for the Rotary Kiln Hazardous Waste Incineration System Revision 1, June 27, 2012. Table 4-3 details the anticipated waste feeds for the test.

A second issue raised by Mr. Hall addressed an allowance found in 40 C.F.R. 63.1209(g)(2)(v) that provides facilities with the option for requesting an alternative operating range for total hydrocarbon (THC) concentration during the CfPT. Mr. Hall noted that it may be in WTI's interest to utilize this option and request a range that differs slightly from the 12-month average identified in the CfPT Plan. WTI agrees that this would be an appropriate course of action and therefore submits the following;

Pertaining to the total hydrocarbon (THC) emissions during the CfPT, the provisions in 40 C.F.R. 63.1209 (g)(2)(v) state that "The Administrator may approve an alternative

range to that required by paragraphs (g)(2)(i) and (ii) of this section if you document in the confirmatory performance test plan that it may be problematic to maintain the required range during the test." The provisions in 63.1207(g)(2)(i) require the THC CEMS emission level to be maintained between the normal operating condition and the THC emission limit of 10 ppmv @7% O2 during the confirmatory test. As noted in Table 4-1, the normal (average) THC value for WTI's incineration system during the 12-month operating period was 0.7 ppmv @7% O_2. While WTI is confident that the THC emission level will be maintained below the 10 ppmv THC emission limit during the CfPT, WTI cannot ensure that the THC emissions will remain above the 0.7 ppmv level since this is an operating parameter that cannot be easily controlled, especially at such a low level. WTI therefore requests that Ohio EPA and US EPA Region 5 approve an alternative operating range for THC between 0 and 10 ppmv @ 7% O_2 for WTI's upcoming CfPT. To meet the requirements of this request, the CfPT Plan has been revised to include documentation that it would be problematic for the incineration system to maintain this operating average during the CfPT. This documentation is included as a footnote to Table 4-1.

The final item discussed during the conference call concerned the manner in which WTI identified information held as confidential business information (CBI) in revision 0 of the CfPT Plan. To correct this issue, WTI asks that Ohio and US EPA return to WTI the versions of revision 0 of the CfPT Plan that were marked as "confidential" so that they may be destroyed. This document will be replaced by the "agency only" copy of revision 1 of the CfPT plan that accompanies this letter. A redacted version has also been provided for public use.

If you have questions concerning the content of the MACT CFT Plan Revision 1 or the alternative operating range request, please contact Vince Waggle of my staff at 330-386-2182.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Frank Murray
Vice President and General Manager
Heritage-WTI, Inc.

Cc: Charles Hall – USEPA Region V (letter and plan)
George Czerniak – USEPA Region V (letter only)
Michelle Tarka, OEPA-DHWM-NEDO (letter only)
Frank Popotnik, OEPA-DHWM-NEDO (letter only)
Ed Fasco, OEPA-DAPC-NEDO (letter only)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: 19 June 2012

SUBJECT: Review of Confirmatory Performance Test Plan for Heritage-WTI, Inc., East Liverpool, Ohio

FROM: Charles Hall, Environmental Engineer
MN/OH Air Enforcement and Compliance Assurance Section

TO: File, Heritage-WTI, Inc., East Liverpool, Ohio

Heritage-WTI, Inc., East Liverpool, Ohio (WTI) owns and operates a hazardous waste incinerator as defined in 40 CFR 63, Subpart EEE, National Emission Standard for Hazardous Air Pollutants from Hazardous Waste Combustors. On May 10, 2012, WTI submitted a confirmatory performance test (CfPT) plan. The following table summarizes the required information that WTI has submitted.

Citation in § 63.1207	Description	Short Comment
(a)	General	OK/See comments.
(b)(1)	CPT	NA
(b)(2)	CfPT	OK
(b)(2)(i)	Demonstrate compliance with the D/F emission standard when the source operates under normal operating conditions; and	OK Table 1-1
(b)(2)(ii)	Conduct a performance evaluation of CMSs required for compliance assurance with the D/F emission standard under § 63.1209(k).	OK 6.0
(b)(3)	One-Time D/F Test for Sources Not Subject to a Numerical D/F Standard	NA
(c)(1)	Initial CPT for LFBs, SFB, and HCl Furnaces	NA
(c)(2)	Data in lieu of the initial CPT	NA
(c)(3)	Initial CPT for incinerators, cement kilns, and LWAKs	NA
(d)(1)	Frequency of CPT	NA

Citation in § 63.1207	Description	Short Comment
	including sampling and monitoring locations in the system, the equipment to be used, sampling and monitoring frequency, and planned analytical procedures for sample analysis;	
(f)(2)(vi)	A detailed test schedule for each hazardous waste for which the performance test is planned, including date(s), duration, quantity of hazardous waste to be burned, and other relevant factors;	OK Table 4-2
(f)(2)(vii)	A detailed test protocol, including, for each hazardous waste identified, the ranges of hazardous waste feed rate for each feed system, and, as appropriate, the feed rates of other fuels and feedstocks, and any other relevant parameters that may affect the ability of the HWC to meet the D/F emission standard;	See below.
(f)(2)(viii)	A description of, and planned operating conditions for, any emission control equipment that will be used;	OK 2.4 and Table 4-1
(f)(2)(ix)	Procedures for rapidly stopping the hazardous waste feed and controlling emissions in the event of an equipment malfunction; and	OK 2.3.6
(f)(2)(x)	Such other information as the Administrator reasonably finds necessary to determine whether to approve the confirmatory test plan.	NA
(g)	Operating conditions during testing. You must comply with the provisions of § 63.7(e). Conducting performance testing under operating conditions representative of the extreme range of normal conditions is consistent with the requirement of § 63.7(e)(1) to conduct performance testing under representative operating conditions.	See below.
(g)(1)	Operating conditions during CPT	NA
(g)(2)	Confirmatory performance testing. You must conduct confirmatory performance testing for D/F under normal operating conditions for the following parameters:	See below.
(g)(2)(i)	CO (or hydrocarbon) CEMS emissions levels must be within the range of the average value to the maximum value allowed, except as provided by 63.1207(g)(2)(v). The average value is	OK Table 4-1

Citation in § 63.1207	Description	Short Comment
	test results to the standard.	
(h)	Operating conditions during subsequent testing	NA
(i)	Time extension for subsequent performance tests	NA
(j)	Notification of compliance	OK 4.6
(j)(1)	CPT	NA
(j)(2)	CfPT	OK 4.6
(j)(3)	See §§ 63.7(g), 63.9(h), and 63.1210(d) for additional requirements pertaining to the NOC.	No rqrmnt for CfPT plan.
(j)(4)	Time extension	No rqrmnt for CfPT plan.
(j)(5)	Early compliance	NA
(k)	Failure to submit a timely notification of compliance	No rqrmnt for CfPT plan.
(l)	Failure of performance test	No rqrmnt for CfPT plan.
(m)	Summary of Waiver Provision	NA
63.1219(c)(3)	Selection of POHC	NA

Longer Comments

Citation in § 63.1207	Description
(f)(2)(vii)	I did not find WTI's response for this item. WTI's summary table (1-3) does not include a row for this item.
(g)(2)(v)	It is odd to me that everyone else who has conducted its CfPT asked for the alternative range, but WTI did not.

Originator

AIR AND RADIATION DIVISION CONCURRENCE SHEET

SUBJECT: Heritage-WTI, Inc., East Liverpool, Ohio
Confirmatory Performance Test Plan

THIS DOCUMENT CONTAINS CONFIDENTIAL BUSINESS INFORMATION YES NO

CONTROL NUMBER (if applicable): _____

	Name	Initials	Date
Typist	C Hall	C Hall	10 July 2012
Originator	C. Hall	C Hall	10 July 2012
Reviewer			
Reviewer			
Section Chief	W. MacDougall	WM	7/16/12
PAS Administrative Staff	L. Shatto	LS	7/12/12
Acting, Branch Chief	E. Pahotsky	EP	7/16/12
Division APA	K. Hoffman		
Deputy Director	B. Sypniewski		
Acting, Division Director	G. Czerniak		

If CONCURRENT SIGNOFF IS NECESSARY, PLEASE INDICATE NAME OF APPROPRIATE DIVISION(S)

NAME OF DIVISION	**ORC**		
Assigned Staff Person			
Division Director			
Other			

NAME OF DIVISION			
Assigned Staff Person			
Division Director			
Other			

OFFICE OF THE REGIONAL ADMINISTRATOR			
Regional Administrator	S. Hedman		
Deputy Regional Administrator	B. Mathur		
Other			

The originator and first level supervisor are responsible for assuring that documents are in plain language. All other reviewers should consider plain language in their reviews. For more information, see the plain language checklist on the reverse side of this sheet.

COMMENTS: _____

_____

_____

RETURN TO: _____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 25 2012

REPLY TO THE ATTENTION OF:

Frank Murray
Vice President and General Manager
Heritage-WTI, Inc.
1250 St. George Street
East Liverpool, Ohio 43920-3400

Dear Mr. Murray:

Heritage-WTI, Inc. (WTI) owns and operates a hazardous waste incinerator as defined in the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors, 40 CFR 63, Subpart EEE ("the HWC MACT"). WTI's hazardous waste incinerator includes waste firing systems, a rotary kiln, a secondary combustion chamber, and a wet air pollution control system. On May 10, 2012, WTI submitted a confirmatory performance test ("CfPT") plan to the U.S. Environmental Protection Agency. On June 29, 2012, WTI revised the CfPT plan to supplement the content of the plan and to request an alternative range for total hydrocarbons (THC). By this letter, EPA approves WTI's CfPT plan and approves WTI's request pertaining to THC.

40 C.F.R. § 63.1207(f)(2) specifies the information that WTI must include in its CfPT plan. EPA reviewed the CfPT plan and concluded that it contains all of the required information.

40 C.F.R. § 63.1207(g)(2)(i through v) specify the operating conditions under which WTI must conduct the CfPT. Pursuant to 40 C.F.R. § 63.1207(g)(2)(i), WTI must conduct the CfPT while the THC emission concentration is between the average concentration during the year prior to the CfPT and 10 parts per million by volume dry basis and corrected to 7 percent oxygen (ppmV @ 7% oxygen), the emission standard set forth in 40 C.F.R. § 63.1219(a)(5)(ii). Pursuant to 40 C.F.R. § 63.1207(g)(2)(v), EPA may approve an alternative range to that required by 40 C.F.R. § 63.1207(g)(2)(i) if WTI documents in the CfPT plan that it may be problematic to maintain the required range during the test. On June 29, 2012, WTI revised the CfPT plan to request an alternative range for THC of 0 to 10 ppmV @ 7% oxygen.

On Table 4-1 of the CfPT plan, WTI stated that the average THC during the year prior to the CfPT was 0.7 ppmV @ 7% oxygen. On June 29, 2012, WTI stated, "While WTI is confident that the THC emission level will be maintained below the 10 ppmv THC emission limit during the CfPT, WTI cannot ensure that the CO emissions will remain above the 0.7 ppmv level since this is an operating parameter that cannot be easily controlled, especially at such a low level." WTI requested an alternative range of 0 to 10 ppmV @ 7% oxygen. EPA is aware that WTI does not and cannot target a THC emission concentration in the same way that it can target a

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particular total waste feed rate or scrubber liquor flow rate. Consequently, EPA approves WTI's request for the THC alternative range of 0 to 10 ppmV @ 7% oxygen.

Summary

By authority duly-delegated to the undersigned, EPA approves WTI's CfPT plan and approves WTI's request for the THC alternative range of 0 to 10 ppmV @ 7% oxygen.

Please direct any questions regarding this letter to Charles Hall of my staff at (312) 353-3443.

Sincerely,

Eileen L. Furey
Acting Chief
Air Enforcement and Compliance Assurance Branch

cc: Erik Bewley, Ohio EPA/Northeast District Office

standard bcc's: Official File Copy w/enclosure(s)
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Branch Reading File w/o enclosure(s)

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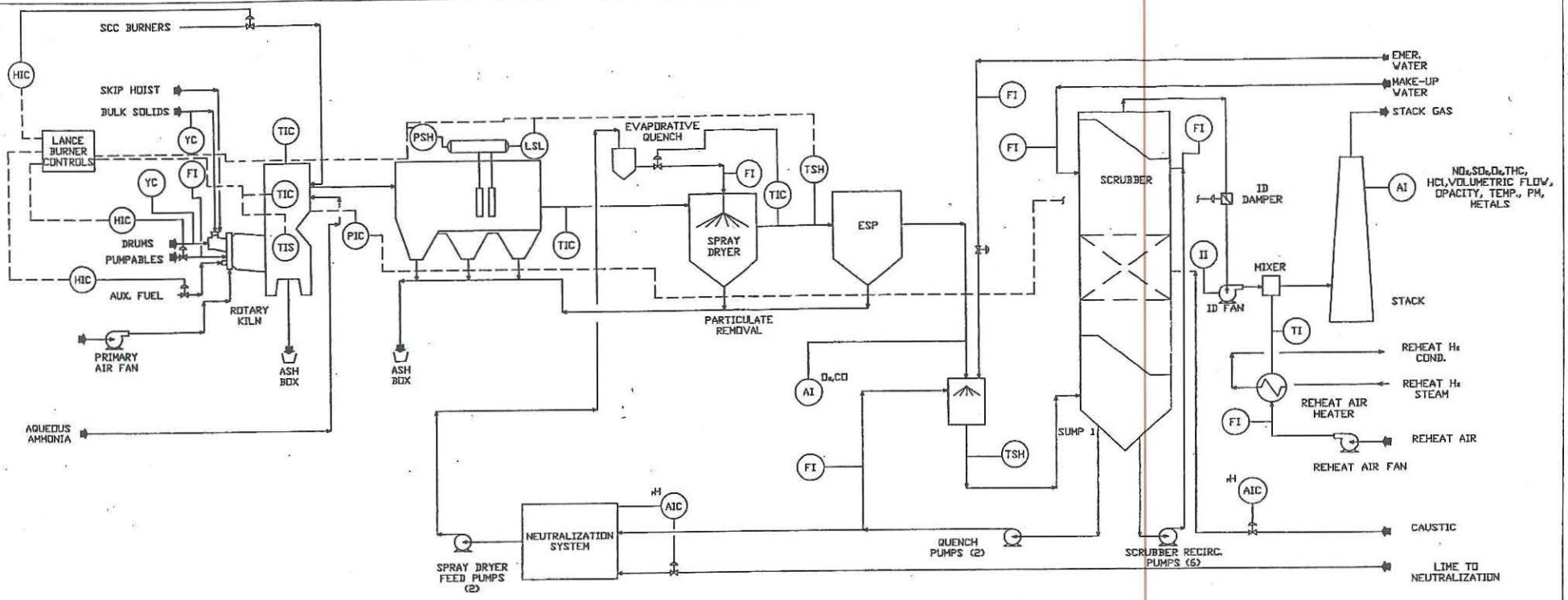

LEGEND

- AI — ANALYZING INDICATOR
- YC — FEED RATE CONTROLLER
- HIC — HAND INDICATING CONTROLLER
- PIC — PRESSURE INDICATING CONTROLLER
- CONTROL VALVE
- TI — TEMPERATURE INDICATOR
- PSH — PRESSURE SWITCH HIGH
- AIC — ANALYZING INDICATING CONTROLLER
- II — MOTOR CURRENT INDICATOR
- TIC — TEMPERATURE SET CONTROLLER
- LSL — LEVEL SWITCH, LOW
- FIC — FLOW INDICATING CONTROLLER
- FI — FLOW INDICATOR
- TSH — TEMP. SWITCH, HIGH
- pH — ACIDITY/ALKALINITY METER
- TIS — TEMP. INDICATING SWITCH

NOTES

1. SCRUBBER RECIRCULATION IS DISTRIBUTED ACROSS THE VESSEL AT STRATEGIC LOCATIONS. THIS ILLUSTRATION IS ONLY REPRESENTATIVE OF THE SCRUBBER RECIRC. FLOW.

FIGURE 2-2

INCINERATION SYSTEM SUMMARY PROCESS CONTROL AND INSTRUMENTATION SYSTEM

VOLKROLL ENVIRONMENTAL ENG. DIV.	WASTE TECHNOLOGIES INDUSTRIES INDUSTRIAL WASTE MANAGEMENT FACILITY EAST LIVERPOOL, OHIO
DRAW	398004-D1